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18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA

20 JACQULYN DELANEY,

21 Plaintiff,

22 vs.

23  
24 STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY; and DOES 1  
25 through 20,

26 Defendants.

CASE NO. 3:16-cv-01149-RS

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
REVISING THE COURT'S SCHEDULING  
ORDER**

**TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

This stipulation to revise the Court's June 30, 2016 Scheduling Order (Dkt. 16) in the above-referenced matter is made and entered into by and between plaintiff Jacquelyn Delaney and defendant State Farm Mutual Automobile Insurance Company ("State Farm"), referred to collectively as the "Parties."

**I.  
RECITALS**

1. WHEREAS, on June 30, 2016, the Court issued its Scheduling Order (Dkt. 16), setting deadlines for fact discovery, expert discovery, and dispositive motions. The Scheduling Order set June 7, 2017, as the fact discovery cutoff and August 25, 2017, as the expert discovery cutoff.

2. WHEREAS, the Parties have not sought any prior extensions to the Court's June 30, 2016 Scheduling Order.

3. WHEREAS, the Parties desire to submit this matter to mediation.

4. WHEREAS, counsel for Delaney and State Farm have engaged in discussions to set the parameters for a possible settlement.

5. WHEREAS, the Parties believe that mediation would be more productive and more likely to settle the case if the Parties have additional time to conduct discovery and assess the merits of the case prior to the mediation.

6. WHEREAS, the Parties do not seek any extension of dates currently set by the Scheduling Order except for the fact discovery cutoff, expert disclosures, and expert discovery cutoff.

7. WHEREAS, the Parties have been working diligently toward moving this case forward in an efficient, expeditious manner. The Parties wish to litigate this matter in a cost-effective manner and avoid unnecessary attorneys' fees and costs.

8. WHEREAS, the Parties have tentatively agreed to hold the mediation session by June 30, 2017, subject to the Court's approval.

9. WHEREAS, the Parties have agreed to submit this Stipulation and [Proposed] Order

1 to Revise the Court's Scheduling Order.

2 10. WHEREAS, the Parties hereby stipulate to revising the Court's June 30, 2016  
3 Scheduling Order as follows.

4 **II.**  
5 **STIPULATION**

6 Plaintiff and State Farm hereby stipulate and agree as follows:

7 1. The Parties agree to the following revisions to the Court's Scheduling Order:

Scheduled Event	Date
Fact Discovery Cutoff	July 24, 2017 (currently June 7, 2017)
Expert Disclosures	August 14, 2017 (currently June 28, 2017)
Rebuttal Expert Disclosures	September 11, 2017 (currently July 28, 2017)
Expert Discovery Cutoff	October 9, 2017 (currently August 25, 2017)
Deadline to Hear Dispositive Motions	September, 7, 2017 (NO CHANGE)
Pre-Trial Conference	November 2, 2017 (NO CHANGE)
Trial Date	November 27, 2017 (NO CHANGE)

25 IT IS SO STIPULATED.

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1 Dated: March 23, 2017

LAW OFFICE OF EDWARD A. JUDGE

2 /s/ Edward A. Judge

3 By: \_\_\_\_\_

4 EDWARD A. JUDGE

Attorney for Plaintiff

JACQULYN DELANEY

6 Dated: March 23, 2017

HUSKINSON, BROWN & HEIDENREICH

8 /s/ David W.T. Brown

9 By: \_\_\_\_\_

10 DAVID W.T. BROWN

Attorneys for Plaintiff

JACQULYN DELANEY

11 Dated: March 23, 2017

HAYES SCOTT BONINO ELLINGSON & McLAY, LLP

13 /s/ Jonathan K. Myers

14 By: \_\_\_\_\_

15 STEPHEN M. HAYES

STEPHEN P. ELLINGSON

JONATHAN K. MYERS

Attorneys for Defendant

STATE FARM MUTUAL AUTOMOBILE

INSURANCE COMPANY

18 Filer's Attestation: Pursuant to Civil Local Rule  
19 5-1(i)(3), Jonathan K. Myers hereby attests that  
20 concurrence in the filing of this document has  
21 been obtained from each of the other signatories.

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**[PROPOSED] ORDER**

Pursuant to the stipulated request by all Parties to this action and good cause appearing, the Court ORDERS the deadlines set by the Court's Scheduling Order continued as follows:

Scheduled Event	Date
Fact Discovery Cutoff	July 24, 2017
Expert Disclosures	August 14, 2017
Rebuttal Expert Disclosures	September 11, 2017
Expert Discovery Cutoff	October 9, 2017
Deadline to Hear Dispositive Motions	September, 7, 2017
Pre-Trial Conference	November 2, 2017
Trial Date	November 27, 2017

IT IS SO ORDERED.

Dated: 3/23, 2017

  
 HONORABLE RICHARD SLEBORG  
 UNITED STATES DISTRICT COURT –  
 NORTHERN DISTRICT